



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

November 6, 2003

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Conn-Selmer, Inc., Vincent Bach Division / SPM 039-17973-00010

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-MOD.dot 9/16/03

November 6, 2003

Mr. Don Schnell
Conn-Selmer, Inc., Vincent Bach Division
500 Industrial Parkway
Elkhart, Indiana 46516

Re: 039-17973
Second Significant Permit Modification to
Part 70 No.: T 039-7813-00010

Dear Mr. Schnell:

Conn-Selmer, Inc., Vincent Bach Division was issued a Part 70 permit on January 4, 2001 for operation of a stationary musical instrument manufacturing plant. A letter requesting changes to this permit was received on July 22, 2003. This modification allows the source to revert back to the use of compliant coatings and solvent based coatings (non-compliant) originally permitted in Part 70 permit T039-7813-00010, which involve significant changes in the terms or conditions, as new conditions are added in the Part 70 permit. Pursuant to the provisions of 326 IAC 2-7-12(d)(1), Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector -Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Conn-Selmer Inc., Vincent Bach Division
500 Industrial Parkway
Elkhart, Indiana 46516**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 039-7813-00010	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:
First Significant Permit Modification 039-14696, issued on November 12, 2001	
Second Significant Permit Modification 039-17973	Pages Affected: 5, 6, 28, 29, 30, 35, 36, 37, 38, 39, 40, 41, 42, 53
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issued: November 6, 2003

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary musical instrument manufacturing source.

Responsible Official:	Don J. Schnell
Source Address:	500 Industrial Parkway, Elkhart, Indiana 46516
Mailing Address:	500 Industrial Parkway, Elkhart, Indiana 46516
Phone Number:	219-295-6730
SIC Code:	3931
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) surface coating booth, identified as EU-03A, for coating brass musical instruments, equipped with electrostatic air atomized spray guns and dry filters for overspray control, exhausting to stack S3A, capacity: 100 instruments per hour.
- (b) One (1) buffing department, with a total capacity of 100 instruments per hour, consisting of six (6) buffing lines including:
 - (1) Department 1051 (Main Buffing) mush buff, identified as EU-01E, constructed in 1988, controlled by baghouse 11A and exhausting through stack S11A;
 - (2) Department 1051 (Main Buffing) EU-01F, constructed in 1997, controlled by baghouse 9A and exhausting through stack S9A;
 - (3) Department 1051 (Main Buffing) EU-01G, constructed in 1997, controlled by baghouse 9B and exhausting through stack S9B;
 - (4) Department 1051 (Main Buffing) EU-01H, constructed in 1997, controlled by baghouse 9C and exhausting through stack 9C;
 - (5) Department 1051 (North Buffing Room), one (1) buffing room, EU-01I, constructed in 1988, controlled by a cyclone and two (2) baghouses 10A and 10B and exhausting through stacks S10A and S10B; and
 - (6) EU-01J (Department 1059 mouthpiece/ Department 1044 small parts buffing), constructed in 1988, controlled by baghouse 10C and exhausting through stack S10C.

- (c) One (1) polishing department, constructed in 1997, with a total capacity of 100 instruments per hour, consisting of three (3) polishing lines and one (1) mush buff line as follows:
 - (1) Department 1041 (Brass Parts Buffing), one (1) mush buff line, identified as EU-01A, and one (1) polish line, identified as EU-01B, controlled by baghouse 11B and exhausting through stack S11B; and
 - (2) Department 1041 (Brass Parts Buffing), two (2) polish lines, identified as EU-01C and EU-01D, controlled by baghouses 11C and 11D and exhausting through stacks S11C and S11D, respectively.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. One (1) natural gas-fired boiler, capacity: 6.28 million British thermal units per hour. [326 IAC 6-2]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment. [326 IAC 6-3-2]
- (c) Furnaces used for melting metals other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume. [326 IAC 6-3-2]
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]
- (e) Activities or categories of activities with individual HAP emissions not previously identified.

Any unit emitting greater than one (1) pound per day but less than five (5) pounds per day of one (1) ton per year of a single HAP.

Brief description: Brazing with alloys containing HAPs (Cadmium). [326 IAC 6-3-2]
- (f) Activities or categories of activities with a combination of HAP emissions not previously identified.

Any unit emitting greater than one (1) pound per day but less than twelve and one half (12.5) pounds per day of two and one half (2.5) ton per year of any combination of HAPs.

Conn-Selmer, Inc., Vincent Bach Division
Elkhart, Indiana
Permit Reviewer: CAO/MES

2nd Significant Permit Modification 039-17973
Modified by: Aida De Guzman

Page 6 of 54
T 039-7813-00010

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) surface coating booth, identified as EU-03A, for coating brass musical instruments, equipped with electrostatic air atomized spray guns and dry filters for overspray control, exhausting to stack S3A, total capacity: 100 instruments per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

The input VOC from the combined usage of the solvent based coatings and compliant coatings, including dilution and cleaning solvents at booth EU-03A shall be limited to less than fifteen (15) pounds per day. Compliance with this limit shall make 326 IAC 8-2-9 not applicable to this facility.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

The PM from booth EU-03A shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and all control devices.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.5 VOC Emissions

Compliance with Condition D.1.1(b) shall be demonstrated within 30 days of the end of each day based on the total volatile organic compound usage at booth EU-03A for that day.

D.1.6 Particulate Matter (PM)

The dry filters for PM control shall be in place at all times when booth EU-03A is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (S3A) while booth EU-03A is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limit established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each day at EU-03A;

(4) The total VOC usage for each day at EU-03A;

- (b) To document compliance with Conditions D.1.6 and D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
AIR COMPLIANCE BRANCH**

Part 70 Quarterly Report

Source Name: Conn-Selmer, Inc. Vincent Bach Division
Source Address: 500 Industrial Parkway, Elkhart, Indiana 46516
Mailing Address: 500 Industrial Parkway, Elkhart, Indiana 46516
Part 70 Permit No.: T 039-7813-00010
Facility: One (1) surface coating booth (EU-03A)
Parameter: VOC usage
Limit: Less than fifteen (15) pounds per day

Month: _____ Year: _____

Day	VOC Usage (lb/day)	Day	VOC Usage (lb/day)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	

16		no. of deviations	
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? No deviation occurred in this month.

? Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Significant Permit Modification

Source Name:	Conn-Selmer Inc, Vincent Bach Division
Source Location:	500 Industrial Parkway, Elkhart, Indiana 46516
County:	Elkhart
SIC Code:	3931
2 nd Significant Permit Modification:	039-17973-00010
Operation Permit No.:	T039-7813-00010
Permit Reviewer:	Aida De Guzman

On October 27, 2003, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Conn-Selmer Inc, Vincent Bach Division had applied for a Part 70 Significant Permit Modification to use a combination of compliant coatings and non-compliant solvent based coatings to be used for the manufacture of musical instruments, originally permitted in Part 70 permit T039-7813-00010. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 27, 2003, Keramida Environmental, Inc., the source's consultant has submitted the following comments to the draft Significant Permit Modification 039-17973-00010:

Comment 1: The source believes that the base permit that the IDEM used for this modification was not the latest permit version. We believe that the First Significant Permit Modification (039-14696) issued on November 12, 2001 is the latest permit and should have been used as the base for this modification. In an effort to preserve any permit language that was negotiated during the last modification, we respectfully request that IDEM use the November 12, 2001 permit as a base for the modification application.

Response 1: A re-review was done to compare the draft permit and the First Significant Permit Modification 039-14696 issued on November 12, 2001. It confirms that the draft was based on the First Significant Permit Modification. Some of the conditions, however, that were in the First Significant Permit Modification were deleted as explained in the TSD of the draft Significant Permit Modification 039-17973, as they no longer applicable.

The Section D.1 table will be modified to delete the reference to "EU-03B" and "stack S3B", as they were inadvertently left out in the draft permit.

Facility Description [326 IAC 2-7-5(15)]:

- (a) ~~Two (2)~~ **One (1)** surface coating booths, identified as EU-03A ~~and EU-03B~~, for coating brass musical instruments, ~~constructed prior to 1970~~, equipped with electrostatic air atomized spray guns and dry filters for overspray control, exhausting to stacks S3A ~~and S3B~~, total capacity: 100 instruments per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Modification

Source Background and Description

Source Name:	Conn-Selmer Inc., Vincent Bach Division
Source Location:	500 Industrial Parkway, Elkhart, Indiana 46516
County:	Elkhart
SIC Code:	3931
Operation Permit No.:	T039-7813-00010
Operation Permit Issuance Date:	January 4, 2001
Permit Modification No.:	039-17973
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a modification application from Conn-Selmer Inc., Vincent Bach Division, a musical instrument Manufacturing source, relating to the following requested changes (additions are **bolded** and deletions are ~~struck through~~ for emphasis):

Request 1: Conn-Selmer is requesting to revert back to the use of solvent based coatings permitted in the original Part 70 permit T039-7813-00010, issued on January 4, 2001. Significant Permit Modification 039-14696, issued in November 12, 2001 allowed Conn-Selmer to use different types of coatings that were all compliant to 326 IAC 8-2-9, however, these coatings resulted in significant quality problems with some of the products.

Response 1: Conn-Selmer will be allowed to revert back to the use of compliant coatings and solvent based coatings originally permitted in Part 70 permit T039-7813-00010, however, restrictions will apply as re-instated in the following conditions:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) ~~Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of clear coating applied to musical instruments at booth EU-03A shall be limited to 4.3 pounds of VOCs per gallon of coating less water.~~

~~Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.~~

The input VOC from the combined usage of the solvent based coatings and compliant coatings, including dilution and cleaning solvents at booth EU-03A shall be limited to less than fifteen (15) pounds per day. Compliance with this limit shall make 326 IAC 8-2-9 not applicable to this facility.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

The PM from **booth EU-03A** the two (2) surface coating booths, identified as EU-03A and EU-03B,

shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Condition D.1.5 will be added back in the permit. Subsequent conditions will be renumbered accordingly.

D.1.5 VOC Emissions

Compliance with Condition D.1.1(b) shall be demonstrated within 30 days of the end of each day based on the total volatile organic compound usage at booth EU-03A for that day.

D.1.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation ~~place~~ at all times when ~~the two (2) surface coating booths, identified as EU-03A and EU-03B~~ **booth EU-03A** are in operation.

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks ~~(S3A and S3B)~~ while ~~one (1) or more of the booths are~~ **booth EU-03A** is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.78 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through ~~(2 4)~~ below. Records maintained for (1) through ~~(2 4)~~ shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) **The cleanup solvent usage for each day at EU-03A;**

(4) The total VOC usage for each day at EU-03A;

(b) no change

(c) no change

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

The following reporting will be added in the permit:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
AIR COMPLIANCE BRANCH**

Part 70 Quarterly Report

Source Name: Conn-Selmer Inc., Vincent Bach Division
Source Address: 500 Industrial Parkway, Elkhart, Indiana 46516
Mailing Address: 500 Industrial Parkway, Elkhart, Indiana 46516
Part 70 Permit No.: T 039-7813-00010
Facility: One (1) surface coating booth (EU-03A)
Parameter: VOC usage
Limit: Less than fifteen (15) pounds per day

Month: _____ **Year:** _____

Day	VOC Usage (lb/day)	Day	VOC Usage (lb/day)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		no. of deviations	

? No deviation occurred in this month.
? Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by:
Title/Position:

Signature:
Date:
Phone:

Attach a signed certification to complete this report.

Request 2: In addition to the request modification the source is requesting that all references to the one (1) open top vapor degreaser, identified as EU-02A be deleted as this unit has been removed from the plant.

Response 2: Section A.2(d) will be modified to delete EU-02A degreaser as follows:

**A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]**

This stationary source consists of the following emission units and pollution control devices:

(a) through (c) no changes

~~(d) One (1) open top vapor degreaser, identified as EU-02A, using trichloroethylene, constructed in 1999, replacing an existing defective decrease which was constructed in 1959, capacity: 11 instruments or equivalent parts per hour.~~

Section D.3. for the open top vapor decrease will also be deleted as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

~~(d) One (1) open top vapor decrease, identified as EU-02A, using trichloroethylene, constructed in 1999, replacing an existing defective decrease which was constructed in 1959, capacity: 11 instruments or equivalent parts per hour.~~

~~(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)~~

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

~~The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart T.~~

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-6]

~~(a) Pursuant to 326 IAC 8-3-6 (Organic solvent decreasing operations: open top vapor decrease operation and control requirements), the owner or operator of the one (1) vapor decrease shall ensure that the following control equipment requirements are met:~~

~~(1) Equip the decrease with cover that can be opened and closed easily without disturbing the vapor zone:~~

~~(2) Equip the decrease with the following switches:~~

~~(A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm:~~

- ~~(B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).~~
- ~~(3) Equip the decrease with a permanent conspicuous label which lists the operating requirements outlined in subsection (b).~~
- ~~(4) Equip the decrease with one (1) of the following control devices:~~
- ~~(A) A freeboard ratio of seventy five hundredths (0.75) or greater and a powered cover if the decrease opening is greater than one (1) square meter (ten and eight-tenths (10.8) square feet).~~
- ~~(B) A refrigerated chiller.~~
- ~~(C) An enclosed design in which the cover opens only when the article is actually entering or exiting the decrease.~~
- ~~(D) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to vapor interface area and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.~~
- ~~(E) Other systems of demonstrated equivalent or better control as those outlined in clauses (A) through (D). Such systems shall be submitted to the U.S. EPA as a SIP revision.~~
- ~~(b) The owner or operator of the vapor decrease shall ensure that the following operating requirements are met:~~
- ~~(1) Keep the cover closed at all times except when processing workloads through the decrease.~~
- ~~(2) Minimize solvent carry out emissions by:~~
- ~~(A) racking articles to allow complete drainage;~~
- ~~(B) moving articles in and out of the decrease at less than three and three tenths (3.3) meters per minute (eleven (11) feet per minute);~~
- ~~(C) decreasing the workload in the vapor zone at least thirty (30) seconds or until the condensation ceases;~~
- ~~(D) tipping out any pools of solvent on the cleaned articles before removal; and~~
- ~~(E) allowing articles to dry within the decrease for at least fifteen (15) seconds or until visually dry.~~
- ~~(3) Prohibit the entrance into the decrease of porous or absorbent materials such as, but not limited to, cloth, leather, wood, or rope.~~
- ~~(4) Prohibit occupation of more than one half (1/2) of the decrease's open top area with the workload.~~

- ~~_____ (5) Prohibit the loading of the decrease to the point where the vapor level would drop to more than ten (10) centimeters (four (4) inches) when the workload is removed.~~
- ~~_____ (6) Prohibit solvent spraying above the vapor level.~~
- ~~_____ (7) Repair solvent leaks immediately or shut down the decrease if leaks cannot be repaired immediately.~~
- ~~_____ (8) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste by solvent by weight could evaporate.~~
- ~~_____ (9) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of decrease open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements.~~
- ~~_____ (10) Prohibit the use of workplace fans near the decrease opening.~~
- ~~_____ (11) Prohibit visually detectable water in the solvent exiting the water separator.~~

~~D.3.3 Halogenated Solvent Cleaning Machine NESHAP [40 CFR Part 63, Subpart T] [326 IAC 20-6-1]~~

~~_____ This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP), which is incorporated by reference as 326 IAC 20-6-1. A copy of the rule is attached.~~

- ~~_____ (a) Pursuant to 40 CFR 63.463(a) & (b), the Permittee shall conform to the following design requirements:~~
 - ~~_____ (1) The cleaning machine shall be designed or operated such that it has a reduced room draft as described in 40 CFR63.463(e)(2)(ii).~~
 - ~~_____ (2) The cleaning machine shall be employed with a control combination of freeboard refrigeration device, reduced room draft, and freeboard ratio of 1.0 or other equivalent methods of control as determined using the procedure in 40 CFR63.469).~~
 - ~~_____ (3) Cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minutes (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.~~
 - ~~_____ (4) Cleaning machine shall be equipped with a device that shuts off sump heat if the sump liquid solvent level drops to the sump heater coils.~~
 - ~~_____ (5) Cleaning machine shall have a primary condenser.~~
 - ~~_____ (6) Cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.~~
- ~~_____ (b) Pursuant to 40 CFR 63.463 (d), the following work and operational practice requirements for the decreasing operation are applicable:~~
 - ~~_____ (1) Control air disturbances across the cleaning machine opening(s) by creating a reduced room draft as described in 40 CFR63.463(e)(2)(ii).~~
 - ~~_____ (2) The parts baskets or the parts being cleaned in the cleaning machine shall not occupy~~

~~more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less:~~

- ~~(3) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.~~
- ~~(4) Parts shall be oriented so that the solvents drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the commissioner.~~
- ~~(5) Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.~~
- ~~(6) During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.~~
- ~~(7) During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.~~
- ~~(8) When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leak proof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.~~
- ~~(9) Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the commissioner's satisfaction to achieve the same or better results as those recommended by the manufacturer.~~
- ~~(10) Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of 40 CFR 63, if requested during an inspection by the commissioner.~~
- ~~(11) Waste solvents, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.~~
- ~~(12) Sponges, fabric, wood, and paper products shall not be cleaned.~~
- ~~(c) Pursuant to 40 CFR 63.463 (e), the Permittee shall comply with the following requirements:~~
 - ~~(1) The Permittee shall conduct monitoring of each control device used to comply with §63.463 as provided in 40 CFR 63.466, monitoring procedures:~~
 - ~~(2) Determine during each monitoring period if the control device used to comply with the above standards meets the following requirements:~~
 - ~~(A) of the air blanket of the freeboard refrigeration device is no greater than 30% of the solvent's boiling point.~~
 - ~~(B) When using a reduced room draft the Permittee shall:~~
 - ~~(i) ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning~~

~~machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at anytime as measured using the procedures in 40 CFR 63.466(d).~~

~~(ii) establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in 40 CFR 63.466 (d).~~

~~(3) An exceedances has occurred if:~~

~~(A) the requirements of paragraph (c)(2)(B)(ii) of this condition are not met; and~~

~~(B) the requirements of paragraphs (c)(2)(A) and (c)(2)(B)(i) of this condition have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameters must be remeasured immediately upon adjustment or repair and demonstrated to be within the required limits.~~

~~(4) the owner or operator shall report all exceedances and all corrections and adjustments made to avoid an exceedances as specified in 40 CFR 63.468.~~

~~D.3.4 Volatile Organic Compounds (VOG) [326 IAC 2-2]~~

~~Any change or modification to the facilities in this permit that increases the potential to emit VOC to 250 tons per year or more may cause the source to become subject to 326 IAC 2-2, Prevention of Significant Deterioration (PSD) and prior approval is required.~~

~~D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B Preventive Maintenance Plan, of this permit, is required for this facility.~~

Compliance Determination Requirements

~~D.3.6 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)] [40 CFR 63.465]~~

~~The Permittee is not required to test this facility by this permit or by 40 CFR Part 63; 40 CFR 63.465 Test Methods. However, IDEM may require compliance testing in writing at any specific time when necessary to determine if the facility is in compliance.~~

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.3.7 Monitoring Procedures [326 IAC 2-7-6(1)] [40 CFR 63.466]~~

~~Pursuant to 40 CFR 63.466 the Permittee shall comply with the following monitoring procedures:~~

~~(a) The Permittee shall conduct monitoring and record the results on a weekly basis for the control devices, as appropriate, specified in paragraph(s) below:~~

~~The Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket of the freeboard refrigeration device, during the idling mode.~~

~~(b) The Permittee shall conduct monitoring and record the results on a monthly basis for the control devices, as appropriate, specified in paragraphs (c) and (d) below:~~

~~(c) The Permittee shall monitor the hoist speed as described below:~~

~~(1) The Permittee shall determine the hoist speed by measuring the time it takes for the~~

~~hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes.~~

~~_____ (2) The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the Permittee may begin monitoring the hoist speed quarterly.~~

~~_____ (3) If the exceedances of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to the monthly until another year of compliance without an exceedances is demonstrated.~~

~~_____ (4) If the Permittee can demonstrate to the commissioner's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.~~

~~_____ (d) The Permittee shall conduct monitoring and record the results, for a reduced room draft, as specified in the following paragraphs:~~

~~_____ The Permittee shall conduct an initial monitoring test of the windspeed and of room parameters, quarterly monitoring of wind speed, and weekly monitoring of room parameters as specified below:~~

~~_____ (1) measure the wind speed within 6 inches above the top of the freeboard area of the solvent cleaning machine using the following procedures:~~

~~_____ (A) determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located.~~

~~_____ (B) orient a velometer in the direction of the wind current at each of the four corners of the machine.~~

~~_____ (C) record the reading for each corner.~~

~~_____ (D) average the values obtained at each corner and record the average wind speed.~~

~~_____ (2) monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.~~

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.8 Record Keeping Requirements

~~_____ (a) The Permittee shall maintain, in written or electronic form, records of the following information specified below, for the life time of the machine,~~

~~_____ (1) Owners's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment.~~

~~_____ (2) The date of installation of the solvent cleaning machine and all of its control devices. If the exact date of the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.~~

~~_____ (3) Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine.~~

- ~~_____ (b) The Permittee shall maintain, in written or electronic form, records of the following information specified below for a period of 5 years:~~
- ~~_____ (1) The results of control device monitoring required under 40 CFR 63.466.~~
- ~~_____ (2) Information on the actions taken to comply with 40 CFR 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.~~
- ~~_____ (3) Estimates of annual solvent consumption for each solvent cleaning machine.~~

~~D.3.9 Reporting Requirements [40 CFR 63.468]~~

~~_____ A summary of the information to document compliance with Condition D.3.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:~~

~~_____ United States Environmental Protection Agency, Region V
_____ Air and Radiation Division, Air Enforcement Branch Indiana (AE-17J)
_____ 77 West Jackson Boulevard
_____ Chicago, Illinois 60604-3590~~

- ~~_____ (a) An initial notification report for the open top batch vapor decrease was submitted on September 22, 1999~~
- ~~_____ (b) An initial statement of compliance for the open top batch vapor decrease was submitted on November 30, 1999.~~
- ~~_____ (c) The Permittee shall submit an annual report by February 1 of each year following the one for which the reporting is being made. This report shall include the requirements as follows:~~
 - ~~_____ (1) A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR63.463(d)(10)."~~
 - ~~_____ (2) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.~~
- ~~_____ (d) The Permittee shall submit an exceedances report to the commissioner semiannually except when, the commissioner determines, on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedances occurs. Once an exceedances has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph 40 CFR 63.468 (i) of this section is approved. Exceedances reports shall be delivered or postmarked by the 30th day following the end of each calender half or quarter, as appropriate. The exceedances report shall include the applicable information as given below:~~
 - ~~_____ (1) Information on the actions taken to comply with 40 CFR 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.~~
 - ~~_____ (2) If an exceedances has occurred, the reason for the exceedances and a description of the actions taken.~~

- ~~_____ (3) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.~~

- ~~_____ (c) Pursuant to 40 CFR 63.463 (i), the Permittee who is required to submit an exceedances report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the following conditions are met:~~

- ~~_____ (1) The source has demonstrated a full year of compliance without an exceedances.~~
- ~~_____ (2) The Permittee continues to comply with all relevant record keeping and monitoring requirements specified in Subpart A (General Provisions) and in 40 CFR 63, Subpart F.~~
- ~~_____ (3) The commissioner does not object to a reduced frequency of reporting for the affected source as provided in paragraphs (e)(3)(iii) of Subpart A (General Provisions) of 40 CFR 63.~~
- ~~_____ (f) The Permittee of a solvent cleaning machine requesting an equivalency determination, as described in 40 CFR 63.469 shall submit an equivalency request report to the commissioner and receive an approval prior to startup.~~

Justification of the Modification

- (a) The above changes involve significant changes in the terms or conditions, as new conditions are added in the Part 70 permit. Therefore, the Part 70 permit is modified through Significant Permit Modification, pursuant to 326 IAC 2-7-12(d)(1).
- (b) The above changes do not constitute a source modification, as no new emission unit is being installed, or the changes do not constitute any physical change or change in the method of operation that increases the PTE or results in emission of pollutant not previously emitted.

Conclusion

The coating changes shall be subject to the conditions of the attached **Significant Permit Modification 039-17973-00010**.